

## **CC Docket No. 94-102 – Status Report**

**Filed by:** Key Communications, L.L.C.  
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**Date:** February 1, 2006

**To:** Marlene H. Dortch, Secretary  
Federal Communications Commission  
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Washington, D.C. 20554

**By Electronic Submission:**

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**STATUS REPORT**  
**Due February 1, 2006**  
**CC Docket No. 94-102**

Key Communications, L.L.C. ("Key") hereby submits its E911 Status Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver of Deadlines for Implementation of Phase II E911 of Key Communications, LLC and Keystone Wireless, LLC*, CC Docket No. 94-102, *Order*, 20 FCC Rcd 16927 ¶19 (2005).

**Carrier Identifying Information:**

**Carrier Name:** Key Communications, L.L.C. – FRN 0005 4134 63

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**Information Regarding PSAPs:**

As of Key's November 21, 2005 Supplement to its Phase II E-911 waiver request (hereinafter, "Supplement"), Key had received nine Phase I requests and nine Phase II requests. Key has not received any new PSAP requests since that date. As previously reported, Key obtained and installed all of the network equipment and software necessary to meet the Phase I requests, installed land lines between the switch and the requesting PSAPs for Phase I deployment, and is compliant with all Phase I requests.

Since the submission of its Supplement, Key has updated all of the requesting PSAPs on the status of its implementation of Phase II E-911, and provided each of them with a copy of the Supplement. Key asked the PSAPs to contact Key if they had any concerns or questions respecting the delay in implementation of Phase II E-911. Key has not heard back from any of the PSAPs, and interprets their silence as consent to Key's Phase II E-911 implementation efforts.

**Implementation of Phase II Service:**

As stated in Key's Supplement, Key is now committed to using a network-based solution for Phase II E-911 in its market. Key has been exploring two network-based solutions currently in development: the Wireless Location Signature

("Polaris WLS") being developed by Polaris Wireless, Inc. ("Polaris"), and The Compass™ Location System ("The Compass™") is developed by GBSD Technologies, Inc. ("GBSD"). Key provided Polaris with basic information respecting Key's network, and Polaris conducted a preliminary analysis based on the Polaris WLS technology. While not willing to put any of its analysis results in writing, Polaris has orally advised Key that Polaris is not willing to take any steps toward modeling Key's market with the Polaris WLS solution, because it feels that the Polaris WLS technology would not even come close to meeting the Phase II E-911 accuracy requirements under §20.18(h) of the Commission's rules with Key's current network configuration.

GBSD is still not ready to conduct an analysis of Key's network based on The Compass™ technology. GBSD advises that it wants to submit its First Office Application ("FOA") results to the FCC before doing so. GBSD advised Key that GBSD anticipates doing so the first part of February, 2006. GBSD has promised to contact Key when it has submitted the FOA results to the FCC, at which time GBSD will began analyzing the feasibility of employing The Compass™ solution within Key's network.

In light of the current situation with the Polaris WLS and GBSD's slow pace in initiating its analysis of The Compass™ in Key's network, Key does not anticipate that Phase II E-911 service will be available in its network in the near future, although Key is continuing to work toward a target date of December 31, 2006, for implementation of a Phase II E-911 solution within its network. Key also is continuing to reevaluate the traditional network-based Phase II solutions and any other new network-based solutions in development, to determine if any are or have become viable solutions for its market.

#### **Construction of New Cells and Expansion of Coverage:**

Key is currently finalizing its 2006 build-out plans for its network. Key is unable to do too much construction during the winter months, due to the generally inclement weather in its market. Key anticipates that it will be some time in the late second quarter or early third quarter of the year before any new sites begin operating.